

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter:	11
	)		
	)	Case No.	15-5998
Pavel Savenok,	)		
	)	Judge:	Hon. Jack B. Schmetterer
	)		
Debtor.	)		

**NOTICE OF MOTION FOR ENTRY OF FINAL DECREE**

TO: See attached Service List

Please take notice that on **February 7, 2017 at 10:00 a.m.**, I shall appear before the Honorable Judge **Jack B. Schmetterer**, or any judge sitting in his place and stead, in **Courtroom No. 682** in the United States Bankruptcy Court, for the Northern District of Illinois, Eastern Division, located at **219 South Dearborn St., Chicago, Illinois**, and present Debtor's ***Motion for Entry of Final Decree***, a copy of which is hereby served upon you.

Joshua D. Greene  
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**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby state that pursuant to the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Wheaton, Illinois on **January 27, 2017**.

/s/ Joshua D. Greene /s/

**Service List**

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**IN THE UNITED STATES BANKRUPTCY COURT  
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EASTERN DIVISION**

In re:	)	Chapter:	11
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	)	Case No.	15-5998
Pavel Savenok,	)		
	)	Judge:	Hon. Jack B. Schmetterer
	)		
Debtor.	)		

**MOTION FOR FINAL DECREE**

NOW COMES the Debtor, Pavel Savenok ("Debtor"), by and through his counsel Joshua D. Greene and the law firm of Springer Brown, LLC, pursuant to Federal Rule of Bankruptcy Procedure 3022 and requests that the court enter an order closing the bankruptcy case. In support of this Motion, the Debtor states as follows:

**Background**

1. This case was commenced on February 23, 2015 when the Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code. No trustee has been appointed.
2. The Debtor has continued to manage his business and assets and to administer the affairs of his estate as debtor in possession in accordance with 11 U.S.C. §§ 1107 and 1108.
3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. Venue is proper pursuant to 28 U.S.C. §§1408 and 1409. This is a core proceeding pursuant to one or more sections of 28 U.S.C. §157(b).
4. On January 3, 2017, the court entered an order confirming the Debtor's Fourth Amended Plan of Reorganization and approving the adequacy of the Debtor's Fourth Amended Disclosure Statement.
5. The Debtor has filed with the court a status report indicating that the Debtor has

made all initial payments required under his Plan and is currently executing his confirmed Plan.

**Relief Requested**

7. Federal Rule of Bankruptcy Procedure 3022 provides that “After an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022. The advisory committee comments to Rule 3022 additionally state that “Entry of a final decree closing a chapter 11 case should not be delayed solely because the payments required by the plan have not been completed.”

8. Debtor requests entry of an order closing the bankruptcy case. There are no pending contested matters for the court to resolve and closing the case will allow the estate to save substantial sums on administrative costs, including attorney’s fees and quarterly fees. Pursuant to the terms of the Plan, once the payments are complete, the Debtor will seek to reopen the case to have his discharge order entered.

**WHEREFORE**, the Debtor requests the entry of an order closing the bankruptcy case, and granting such other and further relief as this court deems just and proper.

Respectfully submitted,  
Pavel Savenok

By: /s/ Joshua D. Greene  
One of his Attorneys

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